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16 Attorneys for Plaintiff
17 ORACLE AMERICA, INC.

20 ORACLE AMERICA, INC., a Delaware
21 corporation.

22 Plaintiff,

23 V.

24 SERVICE KEY, LLC, a Georgia limited
liability company; ANGELA VINES; DLT
25 FEDERAL BUSINESS SYSTEMS
CORPORATION, a Delaware corporation; and
26 DOES 1-50,

27 Defendant.

No. 4:12-cv-00790-SBA

**STIPULATION AND ORDER TO
MODIFY THE CASE SCHEDULING
ORDER AND FOR ADDITIONAL
DEPOSITIONS**

Case No. 4:12-cv-00790-SBA

STIPULATION AND [PROPOSED] ORDER TO MODIFY THE CASE SCHEDULING ORDER
AND FOR ADDITIONAL DEPOSITIONS

1 Plaintiff Oracle America, Inc. (“Oracle”), and Defendants DLT Federal Business Systems
2 Corporation (“DLT-FBS” or “FBSC”), Service Key LLC and Angela Vines (all collectively, “the
3 parties”) hereby stipulate and ask the Court to order as follows:

4 1. Pursuant to Federal Rule of Civil Procedure 16, there is good cause to modify the
5 Court’s September 24, 2012 Order for Pretrial Preparation, Dkt No. 59, as follows:

6 A. The last day to conduct fact discovery depositions is extended to May 15,
7 2013. All notices for fact witness depositions must be served no later than May 3, 2013.

8 B. Except for this extension on the deadline to conduct fact discovery
9 depositions, the May 1, 2013 fact discovery cutoff otherwise remains intact.

10 C. The last day for the parties to designate experts is extended to May 31,
11 2013. The deadline to make rebuttal expert disclosures is extended to June 21, 2013. Expert
12 discovery shall be completed by July 26, 2012.

13 D. This Stipulation and [Proposed] Order does not modify the August 20,
14 2013 motion cutoff date. The parties reserve the right to seek modification of that date if
15 appropriate in the future.

16 2. Oracle may take up to 15 fact witness depositions. However, not more than 6
17 may be of current or former FBSC personnel.

18 3. By entering into this Stipulation and [Proposed] Order, the parties do not waive
19 any proper objection to any discovery request.

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1 Dated: April 9, 2013

Bingham McCutchen LLP

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3 By: /s Thomas S. Hixson
4 Thomas S. Hixson
5 Attorneys for Plaintiff
6 Oracle America, Inc.

7 Dated: April 9, 2013

GCA Law Partners LLP

8 By: /s Valerie M. Wagner
9 Valerie M. Wagner
10 Attorneys for Defendants
11 Service Key LLC and Angela Vines

12 Dated: April 9, 2013

Cloudigy Law PLLC

13 By: /s Antigone G. Peyton
14 Antigone G. Peyton (*pro hac vice*
15 *application pending*)
16 Attorneys for Defendant
17 FBSCGov f/k/a DLT Federal Business
18 Systems Corporation

19 Pursuant to Civil Local Rule 5-1(i), I attest that the concurrence in the filing of this
20 document has been obtained from each of the other signatories.

21 /s Thomas S. Hixson
22 Thomas S. Hixson

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1 PURSUANT TO STIPULATION, IT
2 IS SO ORDERED:

3 DATED:4/10/13

4 By: _____

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Hon. Saundra B. Armstrong
6 United States District Judge
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